

**Annual 47 CFR § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for **2019** covering the prior calendar year **2018**

1. Date filed: **2-18-19**
2. Name of company(s) covered by this certification: **United-KUC, Inc.**
3. Form 499 Filer ID: **820514**
4. Name of signatory: **Krag Johnsen**
5. Title of signatory: **Vice President, Wholesale Business**
6. Certification:

I, Krag Johnsen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

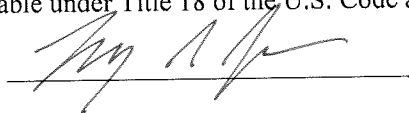
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



**Attachments:**

Accompanying Statement explaining CPNI procedures

**United Utilities, Inc. (Form 499 ID 801906)**  
**United-KUC, Inc. (Form 499 ID 820514)**  
**Yukon Telephone Company, Inc. (Form 499 ID 809596)**  
**Unicom, Inc. (Form 499 ID 801907)**

**Statement of CPNI Compliance Procedures**  
**For the Year Ending 2018**

The following applies to United Utilities, Inc., United-KUC, Inc., Yukon Telephone Company, Inc., and Unicom, Inc. (collectively "UUI"). UUI adheres to all CPNI rules as stated in 47 C.F.R. § 64.2001 -64.2011 concerning the proper use of a customer's CPNI.

1. UUI does not use CPNI for marketing purposes. Additionally, UUI does not share CPNI with any other company for marketing purposes, including affiliates, joint ventures, or independent contractors. Customer service representatives are trained in the non-use of CPNI data.
2. UUI does not release CPNI information to customers or their agents without proper authentication. The authentication requirements are documented in company procedures and customer service representatives are trained in the authentication process.
3. UUI employees are required to review annually company confidentiality policies, which include a description of and requirement for compliance with CPNI requirements. These policies are available at all times on the company intranet.
4. UUI has an express disciplinary process for CPNI violations up to and including termination.
5. UUI maintains a record, for at least one year, of UUI's marketing campaigns.
6. UUI has established an annual certification by a corporate officer with personal knowledge of UUI's policies and procedures to ensure compliance with the federal CPNI rule.
7. UUI has established procedures for notifying relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI.